

1 Scott A. Burroughs (SBN 235718)

scott@donigerlawfirm.com

2 DONIGER / BURROUGHS

3 603 Rose Avenue

Venice, California 90291

4 Telephone: (310) 590-1820

5 *Attorneys for Plaintiff*

6
7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**

9 DUSTIN NEFF,

10 Plaintiff,

11 v.

12 SBA ENTERTAINMENT, LLC, *et al.*,

13 Defendants.
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Case No. 5:23-cv-02518-EKL

STATUS REPORT

1 Plaintiff, Dustin Neff, per the December 12, 2025 Order at Docket No.
2 64, hereby submits this status report to apprise the Court as to how James Corey
3 Goode's bankruptcy proceedings impact this case and Neff's progress in
4 prosecuting his claims.

5 Defendants SBA Entertainment, LLC (SBA) and Goode Enterprise
6 Solutions Inc. ("GES") are owned by Defendant James Corey Goode
7 ("Goode"). Goode, individually, commenced bankruptcy proceedings in
8 Colorado District Court under Case No. 25-16569-JGR¹ but has faced rebuke
9 from the Court. He sought an order extending the bankruptcy's automatic stay
10 against his company GES. *See Exhibit A*. In an order dated December 22,
11 2025, the bankruptcy court noted Goode's representations that GES "has ceased
12 operations, is no longer conducting business, there is no intent to resume
13 business activities, there are no ongoing revenue streams or active contracts,
14 and GES has no independent operations or assets" and stated that "it is unclear
15 why GES would need the protection of the automatic stay, or how the extension
16 of the automatic stay would benefit the Debtors." *See Exhibit B*. On that basis,
17 and due to the lack of any adversary proceeding, the Court denied the stay as to
18 GES. As a result, claims against GES should proceed as should the claims
19 against SBA because it is not subject to a stay in the bankruptcy proceedings.

20 As to Defendants Chicken Soup for the Soul Entertainment, Inc. and
21 TOFG, LLC, their Chapter 7 bankruptcy proceedings persist in U.S.
22 Bankruptcy Court, District of Delaware under docket number 24-11442-MFW.
23 There do not appear to have been any developments that would impact this
24 case.

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26 ¹ In his letter to the Court, Goode represented that he filed for bankruptcy in the
27 "District of Colorado, Case No. 25-17365-TBM." Dkt. 63. This caused some initial
28 confusion to Neff, as he was unable to find any proceedings pertaining to Goode
under Case No. 25-17365-TBM.

1 In the Status Conference held on August 14, 2025, the Court issued an Oral
2 Order to Show Cause “as to Defendants Goode Enterprise Solutions Inc. and SBA
3 Entertainment, LLC regarding their failure to obtain counsel.” Dkt. 61. Former
4 defense counsel Valerie Yanaros previously advised that Goode had additional time to
5 obtain counsel. To date, these Defendants have not yet obtained counsel.

6 Plaintiff has also researched additional parties relevant to this action, including
7 Goode’s other entities, and given his lack of disclosure of this lawsuit on his
8 bankruptcy filings, it appears that he may have plans to transfer the rights to the
9 infringing work at issue to a third party. Plaintiff intends to depose Goode to ascertain
10 what other entities he has created and who currently owns the rights in the infringing
11 work at issue. Once those parties are identified, Plaintiff will amend the complaint or
12 move forward with the pleadings as currently constituted.

13 The Court previously entered default as to Defendants GES (Dkt. 29) and SBA
14 Entertainment (Dkt. 32), but Neff amended his Complaint pursuant to Rule 15(a) on
15 May 28, 2024, effectively nullifying the defaults. Within seven (7) days of the filing
16 of this Report, and because Goode’s bankruptcy proceedings have no bearing on the
17 adjudication of the instant action as he is not a named defendant, Neff will again
18 request Entry of Default as to Defendants SBA and GES. Once the defaults are
19 entered, Neff will file his Motion for Default Judgment as to the same within fourteen
20 (14) days.

21 Respectfully submitted,

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23 Dated: December 31, 2025

24 By: /s/ Scott A. Burroughs
25 Scott A. Burroughs, Esq.
26 DONIGER / BURROUGHS
27 *Attorneys for Plaintiff*
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